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3M

September 24, 2003

By Hand Delivery

Document Processing Center (7407)
Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

Re: **TSCA Section 8(e) Submissions**

Dear Sir/Madam:

3M Company ("3M") requests that EPA place the attached studies in the TSCA Section 8(e) docket. We have included a master index for these studies identifying the study title, test substance and CAS number. A Confidential Business Information (CBI) version of this index and the studies also is being submitted today pursuant to EPA procedures. 3M has not provided CBI substantiation with this submission, but would be willing to do so at the Agency's request.

3M has concluded that data in these studies may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance or otherwise potentially may warrant 8(e) submission based on EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,

Katherine E. Reed (q.a.)

Dr. Katherine E. Reed, Ph.D
Staff Vice President
Environmental Technology and Safety Services
(651) 778-4331
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Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on September 24, 2004
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Primary Eye Irritation Study - Rabbits	[ ]	[ ]
Guinea Pig Contact Dermal Irritation/Sensitization	20% solids (Ethomeen S/12 1.0M with diethyl sulfate 0.94M); 80% water [Ethomeen S/12 = R-N(Et)+(C2H4OH)2 where R=C18 with 1-2 double bonds]	20% (61791-24-0 with 64-67-5); 80% 7732-18-5
Primary Eye Irritation Study - Rabbits	Butanoic acid, heptafluoro-, calcium salt	2366-98-5
Acute Oral Toxicity Screen with T-2712CoC in Albino Rabbits	perfluorohexanoic acid	307-24-4
Primary Skin Irritation Test with T-2725Ec (Repeat Application) in Albino Rabbits	[ ]	[ ]
Acute Ocular Irritation Test with T-2725Ec in Albino Rabbits	[ ]	[ ]
Sensitization Study with T-2741AC in Albino Guinea Pigs	[ ]	[ ]
Oral Rangefinder Study of T-3140BS in Pregnant Rats	1-[3'-(perfluorooctanesulfonate) anilino amide]-2 potassium 3,4,5,6-tetrachlorophthalate	57589-85-2
Oral Rangefinder Study of T-3139BS in Pregnant Rats	80% 1-[3'-(perfluorooctanesulfonate) anilino amide]-2-potassium 3,4,5,6-tetrachlorophthalate; 5% C7 homolog; 5% C5 homolog; 5% C4 homolog; 5% C6 homolog	80% 57589-85-2; 5% 68541-01-5 ; 5% 68541-02-6; 5% 68568-54-7; 5% 68815-72-5
Acute Occular Irritation Test with T-2997CoC in Albino Rabbits	perfluoroethylcyclohexylsulfonic acid diethanol amine salt	salt of 133201-07-7 and 111-42-2
Sensitization Study with T-3386 in Albino Guinea Pigs	[ ]	[ ]
In Vitro Microbiological Mutagenicity Assays of 3M Company's Compound T-3411	[ ]	[ ]

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	[redacted]	[redacted]
Acute Oral Toxicity Screen with T-3448 in Albino Rats	68% poly(oxy-1,2-ethanediyl), alpha-[2-[ethyl[(heptanedecafluorooctyl)sulfonyl]amino]ethyl]-omega-hydroxy-; 12% polethylene glycol; 7% water; 4.86% poly(oxy-1,2-ethanediyl), alpha-[2-[ethyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl]-omega-hydroxy-; 4% residual organic fluorochemical; 3% heptadecafluoro-1-octanesulfonic acid; 0.81% poly(oxy-1,2-ethanediyl), alpha-[2-[ethyl[(undecafluoropentyl)sulfonyl]amino]ethyl]-omega-hydroxy-; 0.3% 1,4-dioxane; 0.2% n-ethylperfluorooctanesulfonamidoethyl alcohol; 0.03% linear n-ethyl perfluorooctanesulfonamide	68% 29117-08-6; 12% 25322-68-3; 7% 7732-18-5; 4.86% 56372-23-7; 4.05% 68298-79-3; 3.24% 68298-81-7; 3% 1763-23-1; 0.81% 68298-80-6; 0.3% 123-91-1; 0.2% 1691-99-2; 0.03% 4151-50-2
In Vitro Microbiological Mutagenicity Assays of 3M Company's Compound T-3516	[redacted]	[redacted]
Acute Dermal Toxicity Study with T-3451 in Albino Rabbits	C8F17SO2N(CH3).Na	Unknown
Acute Oral Toxicity - Method, Summary, Pathology; Primary Dermal Irritation - Method, Summary; Primary Eye Irritation - Method, Summary; Guinea Pig Maximization - Method, Summary	[redacted]	[redacted]
Acute Oral Toxicity - Method, Summary, Pathology; Primary Dermal Irritation - Method, Summary; Primary Eye Irritation - Method, Summary;	[redacted]	[redacted]
	[redacted]	[redacted]
Dermal Sensitization Study in Guinea Pigs, Maximization Test - Method, Summary	[redacted]	[redacted]
	[redacted]	[redacted]
4 Hour Acute Aerosol Inhalation Toxicity Study with T-3825 in Rats	[redacted]	[redacted]
Primary Eye Irritaiton/Corrosion Study in Rabbits	[redacted]	[redacted]
4-Hour Acute Aerosol Inhalation Toxicity Study with T-3825 in Rats	[redacted]	[redacted]

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T-3820: Acute Inhalation Toxicity Test	[ ]	[ ]
T-3821: Acute Inhalation Toxicity Test	[ ]	[ ]
T-3845 Acute Inhalation Toxicity Test	heptafluorobutyryl chloride	375-16-6
Evaluation of the Acute Inhalation Toxicity of T-3920 in the Rat	[ ]	[ ]
Primary Eye Irritation Study in Rabbits - Method, Summary	Decanoic acid, nonadecafluoro-, ammonium salt	3108-42-7
Acute Oral Toxicity Study in Rats (OECD Guidelines)	95% ammonium perfluorodecanoate; 5% ammonium perfluorooctanoate	5% 3825-26-1
Acute Inhalation Toxicity Study with T-4129 in the Rat	[ ]	[ ]
Acute Inhalation Toxicity Study with T-4130 in the Rat	[ ]	[ ]
Acute Oral Toxicity Study in Rats; Acute Dermal Irritation Study in Rabbits; Acute Eye Irritation Study in Rabbits	[ ]	[ ]
Dermal Sensitization Study in Guinea Pigs - Maximization Test	[ ]	[ ]
Mutagenicity Test on T- 4413 [ ] Mouse Lymphoma Forward Mutation Assay with Duplicate Cultures	[ ]	[ ]
Acute Inhalation Toxicity Study with T-4354 in the Rat	[ ]	[ ]
Primary Dermal Irritation/Corrosion Study in Rabbits	[ ]	[ ]
Acute Inhalation Toxicity Study in the Rat with T-4397	[ ]	[ ]
Primary Eye Irritation/Corrosion Study of T-5261 in Rabbits	lithium tetrafluoroethane-1,2-disulfonimide	Unknown
Acute Inhalation Toxicity Evaluation on T-5231 in Rats	[ ]	[ ]
4-Hour, Acute Inhalation Toxicity Study with T-5305 in Rats	[ ]	[ ]
4-Hour, Acute Inhalation Toxicity Study (Limit Test) with T-5343.1 in Rats	[ ]	[ ]

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4-Hour, Acute Inhalation Toxicity Study With T-5306 in Rats	[ ]	[ ]
4-Hour, Acute Inhalation Toxicity Study (Limit Test) with T-5357.1	[ ]	[ ]
Acute Dermal Toxicity Study of T-4201 in Rabbits	Lithium Bis(Trifluoromethanesulfonyl)imide	90076-65-6
SubAcute 28-Day Oral Toxicity with T-2816 by Daily Gavage in the Rat Followed by a 14 Day Recovery Period	[ ]	[ ]
Subacute 28-Day Oral Toxicity with T-2816 by Daily Gavage in the Rat Followed by a 14-Day Recovery Period	[ ]	[ ]
Acute Inhalation Toxicity Evaluation on T-5187 in Rats	[ ]	[ ]
T-4240 4-Week Oral Toxicity Study in Rats	[ ]	[ ]
Dermal Sensitization Study of T-5473 in Guinea Pigs - Maximization Test	[ ]	[ ]
4-Hour, Acute Inhalation Toxicity Study With T-5698 in Rats	[ ]	[ ]
Acute Inhalation Toxicity Evaluation On T-5708 in Rats	[ ]	[ ]
T-5486 Assessment of Cardiac Sensitization Potential in Dogs	octafluoropropane	76-19-7
Acute Inhalation Toxicity Evaluation on T-5655 in Rats	[ ]	[ ]
T-4201 4 Week Oral Toxicity Study in Rats with 2-Week Recovery Period	Lithium Bis(Trifluoromethanesulfonyl)imide	90076-65-6
T-5658: Eye Irritation to the Rabbit	[ ]	[ ]
Acute Inhalation Toxicity Evaluation on T-5715 in Rats	[ ]	[ ]
Acute Inhalation Toxicity Evaluation on T-5716 in Rats	[ ]	[ ]
Acute Inhalation Toxicity Study of T-5724 in Rats	[ ]	[ ]
Acute Inhalation Toxicity Study of T-5725 (Resin Solution) in Rats	[ ]	[ ]

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Acute Inhalation Toxicity Study (Limit Test) of T-5927 in Rats	[redacted]	[redacted]
Acute Inhalation Toxicity Study of T-5928 in Rats (LC50)	[redacted]	[redacted]
Acute Inhalation Toxicity Evaluation on T-5829 in Rats	[redacted]	[redacted]
Single-Dose Intravenous Pharmacokinetic Study of T-5963 in Rabbits	[redacted]	[redacted]
Single-Dose Intravenous Pharmacokinetic Study of T-6030 in Rabbits	[redacted]	[redacted]
5-Daily Dose Dermal Absorption/Toxicity Study of T-6029 and T-6032 in Rabbits	87-93% fluorinated alkyl alkoxylates; 4-10% linear N-ethyl perfluorooctanesulfonamide; 2-4% poly(oxy-1,2-ethanediyl),.alpha.-[2-[ethyl[(pentadecafluoroheptyl)sulfonyl]amino]ethyl]-.omega.-methoxy-; 0-4% residual organic fluorochemicals; 0-2% c8 sulfonamide; 0.1-1% 1-heptanesulfonamide, N-ethyl-1,1,2,2,3,3,4,4,5,5,6,6,7,7,7-pentadecafluoro-; miscellaneous components (each less than 1%)	87-93% 68958-61-2; 4-10% 4151-50-2; 2-4% 68958-60-1; 0-2% 31506-32-8; 0.1-1% 68957-62-0
Single-Dose Intravenous Pharmacokinetic Study of T-6061 in Rabbits	[redacted]	[redacted]
Single-Dose Intravenous Pharmacokinetic Study of T-6065 in Rabbits	[redacted]	[redacted]
Single Dose Intravenous Pharmacokinetic Study of T-6063 in Rabbits	[redacted]	[redacted]
Acute Inhalation Toxicity Study of T-6235 in Rats	[redacted]	[redacted]
Primary Dermal Irritation/Corrosion Study of T-6402 in Rabbits	[redacted]	[redacted]
Dermal Sensitization Study of T-6402 in Guinea Pigs- Maximization Test (EC Guidelines)	[redacted]	[redacted]
Acute Eye Irritation/Corrosion Study with T-6318 in the Rabbit	1-Butanesulfinic acid, 1,1,2,2,3,3,4,4,4-nonafluoro-, Sodium Salt	102061-82-5

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Primary Skin Irritation / Corrosion Study with T-6567 in the Rabbit (4-Hour Semi-Occlusive Application)	[ ]	[ ]
Assessment of Contact Hypersenitivity to T-6318 in the Albino Guinea Pig (Maximization Test)	1-Butanesulfinic acid, 1,1,2,2,3,3,4,4,4-nonafluoro-, Sodium Salt	102061-82-5
Single-Dose Intravenous Pharmacokinetic Study of T-6502 in Rabbits	[ ]	[ ]
Single-Dose Intravenous Pharmacokinetic Study of T-6504 in Rabbits	[ ]	[ ]
Single Dose Intravenous Pharmacokinetic Study of T-6506 in Rabbits	[ ]	[ ]
A Study for Effect on Embryofoetal Development of the Rat (Inhalation Administration)	20-80% methyl nonafluoroisobutyl ether; 20-80% methyl nonfluorobutylether	20-80% 163702-08-7; 20-80% 163702-07-6
Bacterial Reverse Mutation Test of T 6695	[ ]	[ ]
5-day Inhalation Toxicity of Perfluorocyclohexene ([ ]; T-6878) in Rats	70% crude perfluorocyclohexene; 30% perfluoromethylcyclopentene	70% 355-75-9
5-Daily Dose Dermal Absorption/Toxicity Study of T-6502 and T-6503 in Rabbits	[ ]	[ ]
Primary Eye Irritation/Corrosion Study of T-6786 in Rabbits	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Primary Dermal Irritation/Corrosion Study of T-6804 in Rabbits	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
5-Day Inhalation Toxicity Screen of HFE [ ]	c-C6F11OCH3	4943-08-2
Primary Eye Irritation/Corrosion Study of T-6804 in a Rabbit (OECD Guidelines)	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Acute Oral Toxicity Study of T-6804 in Rats (OECD Guidelines)	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Dermal Sensitization Study of T-6908 in Guinea Pigs, Mazimization Test (EC Guidelines)		

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Title	Substance Information	Test Information
Eye Irritation/Corrosion Study of T-4127 in the Rabbit	N-Me Fos Amide-Triphenylbenzyl Phosphonium Chloride Complex; D-1624	31506-32-8
Single-Dose Intravenous Pharmacokinetic Study of T-6924 in Rabbits	[ ]	[ ]
Dermal Sensitization Study of T-6924 in Guinea Pigs- Maximization Test (EC Guidelines)	[ ]	[ ]
Dermal Sensitization Study of T-7003 in Guinea Pigs - Maximization Test (EC Guidelines)	[ ]	[ ]
Report of Sera and Liver Data for [ ] Monoester - Preliminary ADME Study in Rats	N-ethyl heptadecafluoro-N[2-(phosphonooxy)ethyl] octanesulfonamide diammonium salt	67969-69-1
[ ] Diester-Pharmacokinetic Study in Rats (Study No. T-7043.1, DT-26)	ammonium bis[ethyl(perfluorooctane)sulfonayl]phosphate	30381-98-7
Single Dose Intravenous Pharmacokinetic Study with T-7082 in Rabbits	[ ]	[ ]
[ ] Monoester - Pharmacokinetic Study in Rats (Study No. T-6997.2)	N-ethyl heptadecafluoro-N[2-(phosphonooxy)ethyl] octanesulfonamide diammonium salt	67969-69-1
Determination of PFOS Presence and Concentration in Serum from the Dermal Absorption Studies of T-7106 and T-7107 in Hra:(NZW)SPF Rabbits	[ ]	[ ]
Dermal Sensitization Study of T-7285.5 in Guinea Pigs - Maximization Test (EPA/OECD Guidelines)	[ ]	[ ]
Twenty-eight Day Repeated-Dose Oral Toxicity Study of T-6861 in Rats	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Twenty-eight Day Repeated Dose Oral Toxicity Study of T-7005 in Rats	[ ]	[ ]

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Acute (4-Hour) Inhalation Toxicity of Test Atmospheres Obtained after Heating [ ] in Rats	[ ]	[ ]
Toxicokinetic Study of Perfluorooctanesulfonamidoacetate ([ ]; T-7071.2) in Rats	perfluorooctanesulfonamido carboxylic acid	2806-24-8
Acute Nose-Only Inhalation Toxicity Study of T-7087, T-7088, T-7089 and T-7090 in Rats (Limit Test)	[ ]	[ ]
	[ ]	[ ]
Acute Ocular Irritation Study of T-7485 Applied to New Zealand White Rabbits	potassium nonafluorobutanesulfonate	29420-49-3
Toxicokinetic Study of Perfluorooctane Sulfonamide (PFOSA; T-7132.2) in Rats	perfluorooctanesulfonamide	754-91-6
Acute Four-Hour Inhalation Study in Rats	Perflurobutanesulfonyl Fluoride (96-98%) And Perfluorosulfolane (2-4%)	96-98% 375-72-4; 2-4% 42060-64-0
Primary Eye Irritation/Corrosion Study of T-7508.2 in Rabbits	[ ]	[ ]
MV31 K-Salz; Test for Primary Dermal Irritation in the Rabbit	[ ]	[ ]
Assessment of Acute Oral Toxicity with T-7560 In The Rat (Acute Toxic Class Method)	[ ]	[ ]
Acute Eye Irritation/Corrosion Study with T-7560 in the Rabbit	[ ]	[ ]
[ ] Potassium bis-(perfluorobutanesulfonyl)imide Repeat Dose ADME Study in Rats	Potassium bis(perfluorobutanesulfonyl)imide	129135-87-1
Toxicity Study by Repeat Dose Inhalation Administration to CD Rats for 4 Weeks	Perflurobutanesulfonyl Fluoride (96-98%) And Perfluorosulfolane (2-4%)	96-98% 375-72-4; 2-4% 42060-64-0
A Sub-acute(28 Day) Inhalation Toxicity Study, Including a Recovery Study, with T-7479 in Rats	1,1,1,2,2,4,5,5,5-nonafluoro-4-(trifluoromethyl)-3 pentanon	756-13-8
Xenochemical Receptor trans-Activation by Perfluorooctane-based Chemicals	perfluorooctanesulfonamide	754-91-6

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	84% 1-octanesulfonic acid, 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-, potassium salt; 5.5% potassium (perfluorohexyl)sulfonate; 4% potassium nonafluorobutanesulfonate; 4% potassium perfluoroheptanesulfonate; 2% potassium perfluoropentanesulfanate; 0.5% unknown	84% 2795-39-3; 5.5% 3871-99-6; 4% 29420-49-3; 4% 60270-55-5; 2% 3872-25-1
	95% N-ethylperfluorooctanesulfonamidoethyl alcohol; 5% 1-heptanesulfonamide N-ethyl-1,1,2,2,3,3,4,4,5,5,6,6,7,7,7-pentadecafluoro-N-(2-hydroxyethyl)-	95% 1691-99-2; 5% 68555-73-7
Acute Inhalation Toxicokinetic Study of Perfluorooctanesulfonyl Fluroide (POSF) T-7098.4	perfluorooctanesulfonyl fluoride	307-35-7
Five-Day Inhalation Toxicity Study of HFE [ ] in Male CD Rats	c-C6F11-CF2-O-CH3	181214-67-5
Acute Toxicity Screen of Perfluorocyclohexene (T-6878) in Rats	70% crude perfluorocyclohexene; 30% perfluoromethylcyclopentene	70% 355-75-9
[ ] (T-7056) Toxicokinetic Study in Rats	[ ]	[ ]
Assessment of Acute Oral Toxicity with T-7601.3 in the Rat (Acute Toxic Class Method)	N-Methyl Perfluorobutylsulfonamide = 95% 1-Butanesulfonamide, 1,1,2,2,3,3,4,4,4-Nonafluoro-n-Methyl; 5% N-Methyl-4-Hydrido-Perfluorobutylsulfonamide	68298-12-4
Subchronic 90-Day Oral Toxicity Study with T-7320 By Daily Gavage in the Rat Followed by a 28-Day Recovery Period	[ ]	[ ]
Protein Binding of Perfluorobutane Sulfonate, Perfluorohexane Sulfonate, Perfluorooctane Sulfonate and Perfluorooctanoate to Plasma (Human, Rat, and Monkey), and Various Human-Derived Plasma Protein Fractions	84% 1-octanesulfonic acid, 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-, potassium salt; 5.5% potassium (perfluorohexyl)sulfonate; 4% potassium nonafluorobutanesulfonate; 4% potassium perfluoroheptanesulfonate; 2% potassium perfluoropentanesulfanate; 0.5% unknown	84% 2795-39-3; 5.5% 3871-99-6; 4% 29420-49-3; 4% 60270-55-5; 2% 3872-25-1
	potassium nonafluorobutanesulfonate	29420-49-3
	potassium (perfluorohexyl)sulfonate	3871-99-6

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	potassium perfluorooctanoate	2395-00-8
Five Day Inhalation Toxicity Study of [ ] Monochloride, [ ], and HCFC225cb in Male CD Rats	C4F9-OCH2Cl	205367-42-6 (n-isomer) and 221617-86-3 (i-isomer)
	c-C6F11-CF2-O-CH3	181214-67-5
	CF2ClCF2CHClF	507-55-1
Toxicokinetic Screen of [ ] (T-7483) in Rats	C7F15C(O)N(H)CH3	89685-56-3
Low Level Oral Perfluorooctanesulfonate (PFOS) Dose Toxicokinetic Study in Rats: Serum and Liver PFOS	84% 1-octanesulfonic acid, 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-, potassium salt; 5.5% potassium (perfluorohexyl)sulfonate; 4% potassium nonafluorobutanesulfonate; 4% potassium perfluoroheptanesulfonate; 2% potassium perfluoropentanesulfanate; 0.5% unknown	84% 2795-39-3; 5.5% 3871-99-6; 4% 29420-49-3; 4% 60270-55-5; 2% 3872-25-1

BIOSEARCH, INC. p.o. box 8598 philadelphia, pennsylvania 19101
telephone: (215) 848-4499
Project Number: 78-1244A

Submitted to: 3M Company
3M Center
St. Paul, Minnesota
55101

Material: 3M Company - T-2135CoC

Sample Received: 3/20/78 Study Initiated: 4/3/78 Study Completed: 4/25/78

Date of Report: 5/11/78

Test: Guinea Pig Contact Dermal Irritation/Sensitization

Object of Test: To assess the contact dermal irritation/sensitization potential of 3M Company T-2135CoC on guinea pigs.

Method of Test: A group of six guinea pigs weighing between 300 and 400 grams were employed in this study. The backs of the guinea pigs were clipped free of hair. A 0.3 ml portion of sample was applied to the test site.

We pre-treated the test sites in three animals prior to applying T-2135CoC via our modified sodium lauryl sulfate maximizing method.

A gauze patch was placed over the treated areas and an impervious material was wrapped snugly around the trunks of the animals to hold the patch in place. After a 24 hour contact period the patch was removed, the test site was scored for dermal irritation and the animals were allowed to rest for one day. Following this rest period another application was applied to the same skin site using a fresh sample. This sequence was repeated for a total of four applications. After the fourth application the study was discontinued due to the severe skin reactions. The animals were rested for a two week period. At the termination of the rest period a challenge application was put on skin sites differing from the original test sites. The challenge application remained on for 24 hours. Readings were made 24 and 48 hours post application.

Results: See Table 1.

Conclusion: From the results obtained in this study, it appears that T-2135CoC is not a primary irritant. The material is however a strong fatiguing agent and a severe sensitizer. No difference was observed in the degree of irritation between the untreated animals and those pre-treated with sodium lauryl sulfate. After the fatiguing reaction developed, the irritation noted developed into a corrosive reaction.

Karl L. Gabriel

Karl L. Gabriel, V.M.D., Ph.D.
Director

TABLE I

Guinea Pig Contact Dermal Irritation/Sensitization Study

Material: 3M Company - T-2135CoC, as directed.

Guinea Pig No.	Reading After Application Number 1 2 3 4 5 6 7 8 9 10 (Discontinued)	Challenge 24 Hours	48 Hours
1	0 0 1 3	3	3
2	0 0 2 3	3	4
3	0 0 2 3	3	3
4	0 0 1 3	3	4
5	0 0 2 3	3	3
6	0 0 1 3	3	3

Animals 1, 2, & 3 were not pre-treated with sodium lauryl sulfate.

Animals 4, 5, & 6 were pre-treated with sodium lauryl sulfate.